

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

- v. -

KEITH RANIERE, CLARE BRONFMAN,  
ALLISON MACK, KATHY RUSSELL,  
LAUREN SALZMAN, and NANCY SALZMAN,

Defendants.

No. 18-cr-204 (NGG)

**DECLARATION OF  
KATHLEEN E. CASSIDY**

KATHLEEN E. CASSIDY, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am a member of the Bar of this Court and am a partner at Hafetz & Necheles LLP, attorneys for Defendant Clare Bronfman. I am submitting this declaration in support of Defendants Clare Bronfman, Kathy Russell, and Nancy Salzman's Motion to Dismiss the Indictment or in the Alternative for a Bill of Particulars, dated November 16, 2018.

2. On August 14, 2018, Defendants sent a letter to the government requesting further particulars pursuant to Federal Rule of Criminal Procedure 7(f) and other applicable law. Attached hereto as Exhibit A is a true and correct copy of this letter.

3. In accordance with Local Criminal Rule 16.1, counsel for Defendants conferred with the government in good faith. The government refused to provide any further particulars beyond identifying the names of the Jane and John Does in the Superseding Indictment.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 16, 2018  
New York, New York

  
KATHLEEN E. CASSIDY